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VIA ECF

April 17, 2020

Honorable P. Kevin Castel
United States District Judge
Southern District of New York
US Courthouse
500 Pearl Street
New York, N.Y. 10007

Application GRANTED to the limited extent that the government shall produce to defense counsel any medical records relating to the defendant in its possession or control to be kept confidential by defense counsel and used solely for the purpose of his client's bail application.

SO ORDERED.

April 20, 2020



P. Kevin Castel
United States District Judge

**Re: United States v. Saeed Malik Norris
18-Cr-871 (PKC)**

Dear Judge Castel,

Hope this letter finds you well Sir. I am CJA counsel for Mr. Norris who was scheduled to be sentenced on April 14, 2020 following his plea of guilty to Enticement of a Minor To Engage In Illegal Sexual Activity [18 USC §2422(b)]. In light of the ongoing COVID-19 public health emergency, Mr. Norris's sentencing has been adjourned to July 10, 2020.

Mr. Norris is incarcerated at the Westchester County Jail where numerous inmates and staff have tested positive for the deadly virus. Because Mr. Norris has a serious underlying health problem his risk of contracting the virus is increased. In the coming days the defense intends to file a Motion requesting his release on bail, but we presently require the Court's assistance acquiring his BOP medical records from the government. At the defense request, the government has obtained the necessary medical records. We thank the government for its prompt action. The government however is unable to provide the records in the absence of a HIPPA authorization signed by Mr. Norris.

Because counsel is not permitted into the jail during this crisis the defense is unable to obtain the requested HIPPA authorization. Accordingly, the purpose of this letter is to request that the Court endorse this letter directing the government to provide the medical records to the defense forthwith in order to assist in formulating the motion. This request is made on notice to the government and without objection. Thank you for your consideration of this request.

Respectfully submitted,

s/s

Bruce Kaye, Esq.
Thomas Eddy, Esq.

cc.: AUSA Jacob Gutwillig via ECF